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Attorneys for Debtors
PAUL SANDNER MOLLER and
ROSA MARIA MOLLER

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re

Bankruptcy Case No. 2009-29936

PAUL SANDNER MOLLER
and ROSA MARIA MOLLER,

Chapter 11

Debtors

**NOTICE OF LODGING PROPOSED FORM OF
ORDER APPROVING DISCLOSURE STATEMENT
TO PLAN OF REORGANIZATION DATED
SEPTEMBER 14, 2009, FIXING TIME FOR FILING
ACCEPTANCES OR REJECTIONS OF PLAN, AND
SETTING CONFIRMATION HEARING COMBINED
WITH NOTICE THEREOF**

NOTICE IS HEREBY GIVEN that Debtors Paul Sandner Moller and Rosa Maria Moller (“Mollers”), by and through counsel undersigned, have this date lodged their proposed form of Order to Approving Disclosure Statement to Plan of Reorganization Dated September 14, 2009, Fixing Time for Filing Acceptances or Rejections of Plan, and Setting Confirmation Hearing With Notice Thereof, a copy of which is attached hereto as Exhibit “A.”

DATED this 14th day of September, 2009.

Bernheim, Gutierrez & McCready

Dated: _____

By: /s/ William S. Bernheim

William S. Bernheim, Attorney for Debtors

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1 William S. Bernheim, SBN 56555
2 RE: Paul Sandner Moller and Rosa Maria Moller, Debtors
3 U.S. Bankruptcy Court, Eastern District of California, Case # 09-29936-C-11

4 **CERTIFICATE OF MAILING**

5 I declare that I am employed in the County of Solano, State of California. I am over the
6 age of eighteen years and not a party to this action. My business address is Bernheim,
7 Gutierrez, & McCreedy, 255 North Lincoln Street, Dixon, California 95620.

8 I HEREBY CERTIFY that on the date below I served a copy of the above and foregoing
9 **NOTICE OF LODGING PROPOSED FORM OF ORDER APPROVING DISCLOSURE**
10 **STATEMENT TO PLAN OF REORGANIZATION DATED SEPTEMBER 14, 2009, FIXING**
11 **TIME FOR FILING ACCEPTANCES OR REJECTIONS OF PLAN, AND SETTING**
12 **CONFIRMATION HEARING COMBINED WITH NOTICE THEREOF** in the above captioned
13 matter by e-file transmission. The foregoing was filed electronically with the United States
14 Bankruptcy Court via the Court's electronic filing system. Notice of this filing will be sent to
15 all parties by operation of the Court's electronic filing system. I also served a courtesy copy of
16 the foregoing via U.S. Mail to the following:

17 Office of the United States Trustee
18 501 I Street, Suite 7-500
19 Sacramento, CA 95814

Ronald H. Sargis, Esq.
Hefner, Stark & Marois, LLP
2150 River Plaza Dr. Ste. 450
Sacramento, CA 95833

20 Walter R. Dahl, Esq.
21 Dahl & Dahl, Attorneys at Law
22 2304 "N" Street
23 Sacramento CA 95816-5716

Don J. Pool, Esq.
The Law Firm of Powell & Pool
7522 N. Colonial Ave. Ste. 100
Fresno CA 93711

24 GE Money Bank
25 c/o Recovery Management Systems Corp.
26 Attn: Ramesh Singh
27 25 SE 2nd Avenue, Suite 1120
Miami FL 33131-1605

Scott C. Clarkson, Esq.
Clarkson, Gore & Marsella
3424 Carson Street, Suite 350
Torrance CA 90503

28 I declare under penalty of perjury under the laws of the State of California that the
29 foregoing is true and correct.

30 Executed at Dixon, California on September 14, 2009.

BERNHEIM
GUTIERREZ
&
McCREEDY

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LINCOLN
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CA 95620

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/s/ Araceli L. Lemus
Araceli L. Lemus

EXHIBIT A

1 WILLIAM S. BERNHEIM SBN 56555
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8 Attorneys for Debtors
9 PAUL SANDNER MOLLER and
10 ROSA MARIA MOLLER

11 UNITED STATES BANKRUPTCY COURT
12 EASTERN DISTRICT OF CALIFORNIA
13 SACRAMENTO DIVISION

14 In re

Bankruptcy Case No. 2009-29936

15 PAUL SANDNER MOLLER
16 and ROSA MARIA MOLLER,

Chapter 11

17 Debtors

**ORDER APPROVING DISCLOSURE
STATEMENT TO PLAN OF
REORGANIZATION DATED SEPTEMBER
14, 2009, FIXING TIME FOR FILING
ACCEPTANCES OR REJECTIONS OF
PLAN, AND SETTING CONFIRMATION
HEARING COMBINED WITH NOTICE
THEREOF**

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19 A Disclosure Statement under Chapter 11 of the Bankruptcy Code having been filed by the
20 Debtors Paul Sandner Moller and Rosa Maria Moller on September 14, 2009, referring to the *Plan of*
21 *Reorganization Dated September 14, 2009* under Chapter 11 of the Bankruptcy Code filed by the
22 Debtors on September 14, 2009; and

23 It having been after hearing on notice that the Disclosure Statement contains adequate
24 information:

25 **IT IS HEREBY ORDERED** and notice is hereby given that:

26 1. The Disclosure Statement regarding the Debtors' Plan of Reorganization Dated September
27 14, 2009 is approved.

2. There shall be mailed to all creditors, equity security holders, and other parties in interest, and shall be transmitted to the United States trustee, as provided in Bankruptcy Rule 3017(d): (i) a copy of this Order and Notice, (ii) a copy of the duly executed Plan of Reorganization Dated September 14, 2009, (iii) the Disclosure Statement, and (iv) appropriate forms for the acceptance or rejection of the Plan of Reorganization Dated September 14, 2009.

3. The last day for filing and serving, pursuant to Bankruptcy Rule 3020(b)(1), written objections to confirmation of the Debtors Plan of Reorganization Dated September 14, 2009 is October 14, 2009 at 5:00pm.

4. The last day for filing written acceptances or rejections of the Plan of Reorganization Dated September 14, 2009 is October 14, 2009 at 5:00pm.

5. A hearing for consideration of confirmation of the Plan of Reorganization Dated September 14, 2009, and of any objections as may be made to confirmation, will be held on October 27, 2009 at 9:30am in the Robert T Matsui United States Courthouse, 501 I Street, Department C, Courtroom 35, 6th Floor, Sacramento CA 95814.

DATED this ____ day of _____, 2009.

Dated: _____

By: _____

Hon. Christopher M. Klein
U.S. Bankruptcy Judge

**BERNHEIM
GUTIERREZ
&
MC CREADY**

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STREET

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